

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
SANDRIDGE MISSISSIPPIAN TRUST II,
TOM L. WARD, JAMES D. BENNETT,
MATTHEW K. GRUBB, RANDALL D.
COOLEY, JIM J. BREWER, EVERETT R.
DOBSON, WILLIAM A. GILLILAND,
DANIEL W. JORDAN, ROY T. OLIVER,
JR., JEFFREY S. SEROTA, D. DWIGHT
SCOTT, RAYMOND JAMES &
ASSOCIATES, INC., MORGAN
STANLEY & CO. LLC (F/K/A MORGAN
STANLEY & CO INC.), MERRILL
LYNCH, PIERCE, FENNER & SMITH,
INC., CITIGROUP GLOBAL MARKETS
INC., and RBC CAPITAL MARKETS,
LLC,

Defendants.

SANDRIDGE ENERGY, INC.,

Nominal Defendant.

Case No. 5:15-CV-00634-G

CLASS ACTION

**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER
PRELIMINARILY APPROVING SETTLEMENT AND ESTABLISHING
NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiffs the Duane & Virginia Lanier Trust, Ivan Nibur, Jase Luna, Matthew Willenbucher, Reed Romine and Deborah Rath (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, will and hereby move this Court for entry of an Order: (i) granting preliminary approval of the proposed Settlement; (ii) preliminarily certifying, for settlement purposes only, the proposed Settlement Class; (iii) approving the Settling Parties’ proposed form and method of giving notice to the proposed Settlement Class; and (iv) setting a date for a Settlement Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Plaintiffs’ Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and Agreement of Settlement, and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Settling Defendants, Tom L. Ward, Matthew K. Grubb, and James D. Bennett, do not oppose the relief requested by this motion.

Dated: November 16, 2021

/s/ Jonathan Horne

Jonathan Horne (Admitted *Pro Hac Vice*)
Phillip Kim (Admitted *Pro Hac Vice*)
Laurence M. Rosen (Admitted *Pro Hac Vice*)
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Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2021, a true and correct copy of the foregoing **NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Executed on November 16, 2021

/s/ Jonathan Horne
Jonathan Horne